

ORMET CORPORATION
 BUILDING OUR FUTURE TODAY
 P.O. BOX 176 HANNIBAL OHIO 43931

05-965013

1-01353

51-80
111

DATE	REG. NO.
01 04 90	01353

Pay Exactly *****102,721 Dollars and 83 Cents

NET AMOUNT
 *****102,721.83

TO: EPA HAZARDOUS SUBSTANCE
 THE SUPERFUND
 ORDER OF

BANK OF BOSTON
 CONNECTICUT
 WATERBURY, CONN.

**US EPA Region V
 Finance & Accounting
 230 South Dearborn Street
 Chicago, Illinois 60604
 REC'D UNDER CD NO. 065
 1/9/90
 DATED
 AMOUNT \$102,721.83**

ORMET CORPORATION
[Signature]

Nonresponsive

John D. Reggi
 Project Coordinator
 Ormet Corporation
 Route 7
 P.O. Box 17
 Hannibal, Ohio 43931

BD 33
 05290T013
 OTGB05FP1Z
 HSCR
 20X8145.4
 \$102,721.83
 ORMET
 OHIO

RE: Ormet Site

11/22/89

Dear Sir :

The enclosed billing is for the recovery of costs incurred by the U.S. Environmental Protection Agency (EPA) for response activity, performed under the authority of the Comprehensive Environmental Response Compensation and Liability Act as Amended for the period of 4/1/87 thru 3/31/88. These costs were incurred for the Ormet, EPA is due \$102,721.83 on Dec. 22, 1989. This bill is solely for recovery of government response costs, any fines and/or civil penalties due will be billed separately.

This billing invoice is being forwarded to you for payment based on the enclosed consent order. Please make your check payable to EPA Hazardous Substance Superfund and forward your payment to:

EPA Region V
 Attention: Superfund Accounting
 P.O. Box 70753
 Chicago, IL 60673

To avoid additional charges, payment must be received within 30 days of the bill date. If not received, interest will accrue, from the bill date at the rate of 8.47% from October 1, 1989 to September 30, 1990. If there are any questions please contact V. Simmons at (312) 353-4885

FILE COPY



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

John D. Reggi
Project Coordinator
Ormet Corporation
Route 7
P.O. Box 17
Hannibal, Ohio 43931

RE: Ormet Site

12/06/89

Dear Sir :

The enclosed billing is for the recovery of costs incurred by the U.S. Environmental Protection Agency (EPA) for response activity, performed under the authority of the Comprehensive Environmental Response Compensation and Liability Act as Amended for the period of 4/1/87 thru 3/31/88. These costs were incurred for the Ormet site, EPA is due \$102,721.83 on Jan. 06, 1990. This bill is solely for recovery of government response costs, any fines and/or civil penalties due will be billed separately.

This billing invoice is being forwarded to you for payment based on the enclosed consent order. Please make your check payable to EPA Hazardous Substance Superfund and forward your payment to:

EPA Region V
Attention: Superfund Accounting
P.O. Box 70753
Chicago, IL 60673

To avoid additional charges, payment must be received within 30 days of the bill date. If not received, interest will accrue, from the bill date at the rate of 8.47% from October 1, 1989 to September 30, 1990. If there are any questions please contact V. Simmons at (312) 353-4885

To ensure that your payment is properly recorded by EPA for the period of 4/1/87 thru 3/31/88, the following information must be included on the face of your payment check:

Ormet, OH
Account No. OT013
Site No. 1Z

Any questions or problems regarding this billing should be directed to:

U.S. Environmental Protection Agency
ATTN: Vanessa Simmons
230 South Dearborn 5MFS-14
Chicago, Illinois 60604

Thank you for your cooperation

Enclosures

Sincerely yours,
/s/ IVARS P. ANTENS, CHIEF
FINANCIAL MGMT, BR.

Ivars P. Antens
Financial Management Officer

cc: Rhonda E. McBride (5HS-11)
Remedial Project Manager
U.S. E.P.A.
230 S. Dearborn
Chicago, IL 60604

Tom Marks (5HS-12)
Regional Cost Recovery Coordinator
Superfund Program Management Branch
U.S. E.P.A.
230 S. Dearborn
Chicago, IL 60604

Jane Lupton, Attorney
5CS-TUB-3
U.S. E.P.A.
230 S. Dearborn
Chicago, IL 60604

CUMULATIVE COST SUMMARY
ORMET, OHIO
SUPERFUND SITE # 1Z
PREPARED NOVEMBER 21, 1989

Costs from
April 1, 1987
to March 31, 1988

EPA EXPENDITURES

EPA PAYROLL --

Headquarters	\$	0.00
Regional		14,695.57

EPA INDIRECT COSTS --

--		35,934.00
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EPA TRAVEL --

Headquarters		0.00
Regional		3,639.89

NEIC CONTRACT--

--Techlaw-Contract Evidence Team(68-01-7369)		2,064.58
--	--	----------

TES CONTRACT--

--Jacobs Engineering(68-01-7351)		46,387.79
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TOTAL EPA COSTS BEFORE INTEREST	\$	<u>102,721.83</u>
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Pre-judgement Interest		0.00
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TOTAL EPA COSTS FOR ORMET	\$	<u><u>102,721.83</u></u>
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COST SUMMARY DATE: 11/19/89
ORMET CORPORATION, OHIO, OH (SSID = 5 1Z)

Page 1

Prepared: 10/09/86

Cost Data From Pay Period 13 Of FY 87 Through Pay Period 12 of FY 88

EPA PAYROLL -- HEADQUARTERS

DOCUMENTATION: Copies of Applicable Timecards/Timesheets

<u>EMPLOYEE NAME</u>	<u>FISCAL YEAR/ PAY PERIOD</u>	<u>HOURS</u>	<u>AMOUNT (\$)</u>
TOTAL EPA HEADQUARTERS PAYROLL:		0.00	0.00

COST SUMMARY DATE: 11/19/89

Page 1

ORMET CORPORATION, OHIO, OH (SSID = 5 1Z)

Prepared: 10/09/86

Cost Data From Pay Period 13 Of FY 87 Through Pay Period 12 of FY 88

EPA PAYROLL -- REGIONAL

DOCUMENTATION: Copies of Applicable Timecards/Timesheets

<u>EMPLOYEE NAME</u>	<u>FISCAL YEAR/ PAY PERIOD</u>	<u>HOURS</u>	<u>AMOUNT (\$)</u>
ALWAN, ALWAN K.	88-03	25.50	446.53
	88-05	4.00	70.04
	SUBTOTAL	29.50	516.57
ASKEW, SYLVIA A.	87-13	5.00	45.41
	SUBTOTAL	5.00	45.41
ELLY, CHARLES T	87-19	5.00	134.83
	SUBTOTAL	5.00	134.83
HACKLEY, RICHARD D.	87-19	2.50	44.21
	SUBTOTAL	2.50	44.21
HALL, JENNIFER A.	87-22	18.00	207.53
	88-12	19.00	224.29
	SUBTOTAL	37.00	431.82
HARMON, ROSALIND	87-15	9.00	68.51
	SUBTOTAL	9.00	68.51
JOHNSON, LARRY L.	88-11	2.50	61.85
	88-12	28.00	693.02
	SUBTOTAL	30.50	754.87
LEBLANC, PAULINE M.	87-13	4.00	73.60

COST SUMMARY DATE: 11/19/89

Page 2

ORMET CORPORATION, OHIO, OH (SSID = 5 1Z)

Prepared: 10/09/86

Cost Data From Pay Period 13 Of FY 87 Through Pay Period 12 of FY 88

EPA PAYROLL -- REGIONAL

DOCUMENTATION: Copies of Applicable Timecards/Timesheets

<u>EMPLOYEE NAME</u>	<u>FISCAL YEAR/ PAY PERIOD</u>	<u>HOURS</u>	<u>AMOUNT (\$)</u>
LEBLANC, PAULINE M. (Continued)			
	87-14	7.00	128.79
	87-17	7.00	128.79
	87-18	13.00	239.18
	87-19	8.00	147.19
	87-20	2.00	36.79
	87-21	14.00	257.58
	87-22	27.00	496.77
	87-23	20.00	367.96
	87-24	0.00	0.00
	87-25	10.00	183.99
	87-26	7.00	128.79
	87-27	5.00	91.98
	88-01	8.00	147.18
	88-02	20.00	367.96
	88-03	12.00	220.78
	88-04	5.00	95.52
	88-05	6.00	114.62
	88-06	4.00	76.41
	88-07	10.00	598.38
	SUBTOTAL	189.00	3902.26
LEE, ROBERT D.			
	87-20	13.00	223.34
	87-21	22.00	377.95
	87-22	4.00	68.72
	88-02	17.00	292.06
	88-04	1.00	17.18
	SUBTOTAL	57.00	979.25
LUPTON, JANE MARGARET			
	87-13	2.20	43.21
	87-14	0.50	9.68
	87-15	1.80	35.30
	87-16	1.50	30.31
	87-19	1.00	20.15

COST SUMMARY DATE: 11/19/89

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ORMET CORPORATION, OHIO, OH (SSID = 5 12)

Prepared: 10/09/86

Cost Data From Pay Period 13 Of FY 87 Through Pay Period 12 of FY 88

EPA PAYROLL -- REGIONAL

DOCUMENTATION: Copies of Applicable Timecards/Timesheets

<u>EMPLOYEE NAME</u>	<u>FISCAL YEAR/ PAY PERIOD</u>	<u>HOURS</u>	<u>AMOUNT (\$)</u>
LUPTON, JANE MARGARET (Continued)	87-24	10.00	198.46
	88-03	0.50	9.73
	SUBTOTAL	17.50	346.84
MCBRIDE, RHONDA E.	88-06	25.00	351.62
	88-07	40.00	565.90
	88-08	29.00	420.68
	88-09	6.00	87.04
	88-10	71.00	1029.93
	88-11	49.00	710.80
	88-12	36.00	522.22
	SUBTOTAL	256.00	3688.19
MUFFITT, GAIL S.	87-22	1.00	8.43
	88-02	2.00	16.62
	SUBTOTAL	3.00	25.05
PAYNE, DAVID A	87-18	4.00	105.20
	87-19	2.00	52.60
	88-12	12.00	324.43
	SUBTOTAL	18.00	482.23
RANDALL, SHEILA A.	88-11	2.00	18.32
	SUBTOTAL	2.00	18.32
REYNOLDS, WILLIAM L.	87-14	26.00	430.89
	87-15	9.00	149.17

COST SUMMARY DATE: 11/19/89

Page 4

ORMET CORPORATION, OHIO, OH (SSID = 5 1Z)

Prepared: 10/09/86

Cost Data From Pay Period 13 Of FY 87 Through Pay Period 12 of FY 88

EPA PAYROLL — REGIONAL

DOCUMENTATION: Copies of Applicable Timecards/Timesheets

<u>EMPLOYEE NAME</u>	<u>FISCAL YEAR/ PAY PERIOD</u>	<u>HOURS</u>	<u>AMOUNT (\$)</u>
REYNOLDS, WILLIAM L. (Continued)			
	SUBTOTAL	35.00	580.06
THAKKAR, JAYANTILAL R.	87-21	9.00	191.08
	87-23	6.00	127.38
	87-24	18.00	382.16
	SUBTOTAL	33.00	700.62
THOMAS, FRANCIS	87-19	1.00	24.36
	SUBTOTAL	1.00	24.36
TSAI, CHENG-WEN	87-20	1.00	23.96
	87-22	17.00	395.23
	88-02	9.00	205.58
	88-04	3.00	68.52
	88-05	8.00	182.74
	88-11	14.00	330.87
	88-12	11.00	267.26
	SUBTOTAL	63.00	1474.16
WESOLOWSKI, DENNIS J.	87-23	3.50	70.94
	87-24	16.00	323.92
	87-26	1.00	20.90
	87-27	1.50	31.37
	88-03	1.50	30.88
	SUBTOTAL	23.50	478.01
TOTAL EPA REGIONAL PAYROLL:		816.50	14695.57

SUMMARY OF INDIRECT COSTS FOR ORMET CORPORATION, OHIO (SSID: 5 1Z)

DATE: 11/19/89

Data From Pay Period 13 Of FY 87 Through Pay Period 12 Of FY 88

Total Direct Hours x Rate(\$) = Subtotal(\$)

FY 1987	249.00	53	13197.00
FY 1988	429.00	53	22737.00

TOTAL INDIRECT COSTS TO CLAIM IN COST RECOVERY:	35934.00
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INDIRECT COSTS REPORT FOR ORMET CORPORATION, OHIO (SSID: 5 1Z)

DATE: 11/19/89

Page 1

Data From Pay Period 13 Of FY 87 To Pay Period 12 Of FY 88 .

FISCAL		NUMBER OF HOURS	INDIRECT	
YEAR	EMPLOYEE NAME	AH RC	ATTRIBUTED TO SITE WORK	COSTS RATE (\$)
				INDIRECT COSTS (\$)
87	ELLY, CHARLES T	05W	5.00	
	LEBLANC, PAULINE M.	05F	124.00	
	LEE, ROBERT D.	05Z	39.00	
	MUFFITT, GAIL S.	05Z	1.00	
	PAYNE, DAVID A	05Z	6.00	
	THAKKAR, JAYANTILAL R.	05W	33.00	
	THOMAS, FRANCIS	05W	1.00	
	TSAI, CHENG-WEN	05Z	18.00	
	WESOLOWSKI, DENNIS J.	05W	22.00	
		SUBTOTAL	249.00	53 13197.00
88	ALWAN, ALWAN K.	05W	29.50	
	LEBLANC, PAULINE M.	05F	65.00	
	LEE, ROBERT D.	05Z	18.00	
	MCBRIDE, RHONDA E.	05F	256.00	
	MUFFITT, GAIL S.	05Z	2.00	
	PAYNE, DAVID A	05W	12.00	
	TSAI, CHENG-WEN	05Z	45.00	
	WESOLOWSKI, DENNIS J.	05W	1.50	
		SUBTOTAL	429.00	53 22737.00
		TOTAL HOURS AND INDIRECT COSTS	678.00	35934.00

COST SUMMARY DATE: 11/19/89
ORMET CORPORATION, OHIO, OH (SSID = 5 1Z)
Prepared: 10/09/86
Cost Data From 04/01/87 Through 03/31/88

Page 1

EPA TRAVEL - HEADQUARTERS

DOCUMENTATION: Copies of Travel Authorizations, Travel Vouchers
and Treasury Schedules

<u>EMPLOYEE NAME</u>	<u>FISCAL YEAR</u>	<u>TRAVEL AUTHORIZATION NO.</u>	<u>AMOUNT</u>	<u>PAID TREASURY SCHEDULE NUMBER AND TRANSACTION DATE</u>
TOTAL EPA HEADQUARTERS TRAVEL \$			0.00	

COST SUMMARY DATE: 11/19/89
ORMET CORPORATION, OHIO, OH (SSID = 5 1Z)
Prepared: 10/09/86
Cost Data From 04/01/87 Through 03/31/88

Page 1

EPA TRAVEL - REGIONAL

DOCUMENTATION: Copies of Travel Authorizations, Travel Vouchers
and Treasury Schedules

<u>EMPLOYEE NAME</u>	<u>FISCAL YEAR</u>	<u>TRAVEL AUTHORIZATION NO.</u>	<u>AMOUNT</u>	<u>PAID TREASURY SCHEDULE NUMBER AND TRANSACTION DATE</u>
HALL, JENNIFER A.	87	OTRIS75916	303.00	T0082 09/25/87
		000TS75916	163.50	V0506 08/24/87
		SUBTOTAL \$	466.50	
LEBLANC, PAULINE M.	87	OTRIS76354	297.00	V0532 09/04/87
		000TS76354	138.80	V0532 09/04/87
		SUBTOTAL \$	435.80	
LUPTON, JANE MARGARET	87	OTRIS76351	297.00	V0551 09/26/87
		000TS76351	91.75	V0551 09/26/87
		SUBTOTAL \$	388.75	
MCBRIDE, RHONDA E.	88	OTRIS82071	355.00	T0040 03/01/88
		000TS82071	258.75	V0420 02/23/88
		000TS83152	272.73	V0543 03/25/88
		SUBTOTAL \$	886.48	
PICCIONE, RAYMOND V.	87	OTRIS76192	409.00	T0084 09/26/87
		000TS76192	61.75	V0559 09/28/87
		SUBTOTAL \$	470.75	
THAKKAR, JAYANTILAL R.	87	OTRIS76191	409.00	T0084 09/26/87
		000TS76191	97.91	V0542 09/15/87
		SUBTOTAL \$	506.91	
WESOLOWSKI, DENNIS J.	87	OTRIS76190	409.00	T0084 09/26/87

COST SUMMARY DATE: 11/19/89
ORMET CORPORATION, OHIO, OH (SSID = 5 1Z)
Prepared: 10/09/86
Cost Data From 04/01/87 Through 03/31/88

Page 2

EPA TRAVEL - REGIONAL

DOCUMENTATION: Copies of Travel Authorizations, Travel Vouchers
and Treasury Schedules

<u>EMPLOYEE NAME</u>	<u>FISCAL YEAR</u>	<u>TRAVEL AUTHORIZATION NO.</u>	<u>AMOUNT</u>	<u>PAID TREASURY SCHEDULE NUMBER AND TRANSACTION DATE</u>	
WESOLOWSKI, DENNIS J. (Continued)					
		0TRIS76190	11.00	V0542	09/15/87
		000TS76190	64.70	V0542	09/15/87
		SUBTOTAL \$	484.70		
		TOTAL EPA REGIONAL TRAVEL \$	3639.89		

COST SUMMARY DATE: 11/19/89
ORMET CORPORATION, OHIO, OH (SSID = 5 1Z)
Prepared: 10/09/86
Cost Data From 04/01/87 To 03/31/88

Page 1

NATIONAL ENFORCEMENT INVESTIGATION CENTER (NEIC)

CONTRACTOR: TECHLAW-CONTRACT EVIDENCE AUDIT TEAM

CONTRACT NO: 68-01-7369

PROJECT OFFICER:

DATES OF SERVICE: FROM: / / TO: / /

SUMMARY OF SERVICE:

TOTAL CONTRACTOR COST: \$ 2064.58

DOCUMENTATION: Copies of Applicable Paid Vouchers and Treasury Schedules

VOUCHER NUMBER	VOUCHER DATE	VOUCHER AMOUNT	TREASURY SCHEDULE NUMBER AND TRANSACTION DATE	SITE AMOUNT
8	09/10/87	307440.76	R8549 02/04/88	2030.16
9	10/08/87	369146.42	R8557 11/16/87	34.42

COST SUMMARY DATE: 11/19/89
ORMET CORPORATION, OHIO, OH (SSID = 5 1Z)
Prepared: 10/09/86
Cost Data From 04/01/87 To 03/31/88

Page 1

TECHNICAL ENFORCEMENT SUPPORT (TES) CONTRACT

CONTRACTOR: JACOBS ENGINEERING

CONTRACT NO: 68-01-7351

PROJECT OFFICER:

DATES OF SERVICE: FROM: / / TO: / /

SUMMARY OF SERVICE:

TOTAL CONTRACTOR COST: \$ 46387.79

DOCUMENTATION: Copies of Applicable Paid Vouchers and Treasury Schedules

<u>VOUCHER NUMBER</u>	<u>VOUCHER DATE</u>	<u>VOUCHER AMOUNT</u>	<u>TREASURY SCHEDULE NUMBER AND TRANSACTION DATE</u>	<u>SITE AMOUNT</u>
7	04/30/87	567589.82	R8524 07/20/87	304.66
7	04/30/87	567589.82	R8524 07/20/87	212.81
8	05/31/87	699343.74	R8538 09/09/87	3843.40
8	05/31/87	699343.74	R8538 09/09/87	173.26
9	06/30/87	1072091.54	R8541 09/23/87	1969.66
9	06/30/87	1072091.54	R8541 09/23/87	58.26
10	07/31/87	1422708.62	R8544 09/28/87	7433.56
10	07/31/87	1422708.62	R8544 09/28/87	284.45
11	08/31/87	1637156.39	R8552 10/30/87	4603.24
11	08/31/87	1637156.39	R8552 10/30/87	122.79
12	09/30/87	1885111.24	R8569 12/15/87	3501.21
12	09/30/87	1885111.24	R8569 12/15/87	337.23
13	10/31/87	489321.97	R8578 01/05/88	834.66
13	10/31/87	489321.97	R8578 01/05/88	20.07
14	10/31/87	1066644.56	R8581 01/11/88	3849.19
14	10/31/87	1066644.56	R8581 01/11/88	50.18
15	11/30/87	360643.43	R8592 03/02/88	15870.79
18	12/31/87	1665291.49	R8612 03/11/88	1676.53
18	12/31/87	1665291.49	R8612 03/11/88	220.76
20	01/31/88	1709101.58	R8620 03/29/88	985.55
20	01/31/88	1709101.58	R8620 03/29/88	35.53

ORMET CORPORATION

P.O. BOX 176
HANNIBAL, OHIO 43931

January 4, 1990

3

EPA Region V
P. O. Box 70753
Chicago, Illinois 60673

Attention: Superfund Accounting

Re: Ormet Site Account No. OT012, OT013 and OT014

Dear Sir or Madam:

Enclosed with this letter are three checks payable to the "EPA Hazardous Substance Superfund." The first check is in the amount of \$64,672.11 for Account No. OT012. The second check is in the amount of \$102,721.83 for Account No. OT013. The third check is in the amount of \$186,709.00 for Account No. OT014.

The enclosed payments were prepared and submitted in accordance with and reliance upon the instructions set forth in letters signed by Ivars P. Antens dated December 6, 1989. We note that those instructions deviate from the provisions of Subsection XXV-C of the March, 1987 Consent Order between the parties (In the Matter of Ormet Corporation, U.S. EPA, Docket No. V-W-87-C-013). We presume that Mr. Antens' letters of December 6, 1989 supersede the provisions of Subsection XXV-C and that Ormet's payments in accordance therewith are in full compliance with the Consent Order.

While Ormet is paying the full amounts billed under Account Nos. OT012, OT013 and OT014, it is doing so under protest.

Subsection XXV-B of the Consent Order specifically provides that:

. . . U.S. EPA . . . shall submit an accounting to [Ormet] for all oversight costs incurred by the U.S. EPA . . . with respect to this Consent Order . . . including, but not limited to, the costs incurred by the U.S. EPA in having a qualified person oversee the conduct of the RI/FS pursuant to Section 104(a) of CERCLA."
(Emphasis added).

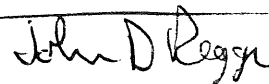
Per my letter dated June 2, 1989 to Rhonda E. McBride, U.S. EPA's Remedial Project Manager, Ormet objected to the initial statements of oversight costs which were submitted to Ormet by Ms. McBride's letter of May 23, 1989. By letter dated December 8, 1989, Mr. Antens agreed with Ormet that the statements sent by Ms. McBride's letter of May 23 were not proper billings under the Consent Order.

The "billings" submitted to Ormet by Mr. Antens' letters of December 6, 1989 contain more accounting detail than previously provided with respect to EPA's internal costs. However, the December 6 billings do not contain any accounting of outside contractor costs. Therefore, Ormet must once again remind U.S. EPA of its obligations under the Consent Order and we hereby demand that U.S. EPA comply with the provisions of the Consent Order with respect to providing an adequate accounting of U.S. EPA's oversight costs.

Ormet's payment in response to the inadequately supported billings at this time is in keeping with our ongoing commitment to deal with U.S. EPA in good faith. However, Ormet will make no further cost reimbursement payments to U.S. EPA unless and until it receives a full and proper accounting for the periods covered by the December 6 billings.

We look forward to receiving the required accounting information promptly.

Sincerely,



J. D. Reggi
Ormet Project Coordinator

JDR:smg
Enclosures

cc: Ivars P. Antens
Vanessa Simmons
Rhonda E. McBride
Jane Lupton
John W. Ubinger, Jr.